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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

BRIEAUNA GIBSON,

Plaintiff,

v.

ANTHONY VALVANO, AMIR BETHEA,
KELLY BURLIAN, DIANA TORRES,
JOSEPH RIOTTO, FRANCIS CASCARELLI,
SCO F/N/U GREEN A/K/A BASKERVILLE,
KEVIN PEREZ, SEAN ST. PAUL, SARAH
DAVIS, ROBIN KELLER AND JOHN DOES
1 TO 10, ALL INDIVIDUALLY AND IN
THEIR OFFICIAL CAPACITIES AS NEW
JERSEY DEPARTMENT OF
CORRECTIONS OFFICERS AND/OR
EMPLOYEES; AND MARCUS HICKS,
COMMISSIONER OF THE STATE OF NEW
JERSEY DEPARTMENT OF
CORRECTIONS, IN HIS OFFICIAL
CAPACITY, ONLY,

Defendants.

Civil Action No. 21-3150(MAS)(TJB)

CIVIL ACTION

NOTICE OF MOTION FOR STAY

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on August 16, 2021, at 9:00 a.m., or as soon thereafter as
counsel may be heard, the undersigned attorneys for Defendant Anthony Valvano (“Valvano”)

will move before the Honorable Michael A. Shipp, U.S.D.J., at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for an Order granting Valvano's Motion to Stay, or in the alternative, for additional time to answer, move or otherwise respond to the Amended Complaint following entry of an order denying the motion to stay.

PLEASE TAKE FURTHER NOTICE that Valvano relies upon the enclosed Memorandum of Law and Certification of John J. Peirano, Esq.

PLEASE TAKE FURTHER NOTICE that a Proposed Order is annexed hereto in accordance with L. Civ. R. 7.1(e).

PLEASE TAKE FURTHER NOTICE that oral argument is requested on the motion.

Dated: July 16, 2021

Respectfully submitted,

s/ John J. Peirano

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